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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS  
FINANCIAL SERVICES INC.,

Plaintiff,

vs.

ARTHUR KUPPERMAN; E. ROSS  
BROWNE; PAULETTE KRELMAN,  
PGB INTERNATIONAL, LLC; and JP  
MORGAN CHASE BANK, NATIONAL  
ASSOCIATION,

Defendants.

Civil Action No: 06 Civ. 4802 (DMC)

**DECLARATION OF CATHERINE L.  
BRIICK In SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT ON COUNT  
FOUR OF VERIFIED COMPLAINT**

**CATHERINE L. BRIICK**, of full age, pursuant to 28 U.S.C. §1746, declares as follows:

1. I am a Vice President with the Special Handling unit at Merrill Lynch Business Financial Services Inc. ("MLBFS").

2. The amount owed to MLBFS by PITTRA G.B. International, Inc. (exclusive of collection costs) as of the close of business on October 30, 2006 was \$4,179,059.54 calculated as follows:

WCMA Line of Credit:

Principal	\$3,803,138.55	
Accrued Interest	+ <u>26,838.39</u>	
		3,829,976.94
5% late charge		+ <u>188,822.76</u>
		4,018,799.70

<u>Term Loan:</u> Principal	\$149,572.53	
Accrued Interest	+ <u>3,208.68</u>	
		152,781.21
5% late charge		+ <u>7,478.63</u>
		+ <u>160,259.84</u>
		\$4,179,059.54

3. Pursuant to the loan documents, the unpaid principal balance of each loan accrues interest at a rate equal to the sum of (i) 3.15% per annum and (ii) the one-month London Interbank Offered Rate ( generally known as "LIBOR") published from time to time in the "Money Rates" section of *The Wall Street Journal*.

I declare under penalty of perjury that the foregoing is true and correct.

  
Catherine L. Briick

Dated: October 31, 2006